

NOV 22 2005

Richard W. Pierce, Law Office
P.O. Box 503514
Saipan, MP 96950-3514
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Attorney for Defendant Masayuki Isoda

IN THE UNITED STATES DISTRICT COURT
FOR THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

PEDRO R. DELEON GUERRERO,

Plaintiff,

vs.

MASAYUKI ISODA, aka,

MIKE ISODA,

Defendant.

Civil Action No. 04-0033

**DECLARATION OF COUNSEL IN
SUPPORT OF DEFENDANT
MASAYUKI ISODA'S
SUBMISSION OF ATTORNEY'S
FEES AND COST**

I, Richard W. Pierce, declare as follows:

1. I am counsel for Defendant in this proceeding. The attached billings by me reflect time and cost and fees for my representation of the Defendant related to this proceeding. The attachments are true copies of the originals kept in electronic form on the computers at my office and were prepared from contemporaneous time records and invoices. The total billing thus far is \$5,924.66. Attorney's fees total \$5,618.66 and Costs total \$306.00.

2. My hourly fee of \$215.00 to the Defendant is reasonable in this community and is comparative with attorneys of similar experience. I have been a practicing attorney for about 25 years, and I have adequate trial experience.

3. Throughout my representation of the Defendant, I was mindful of fees and costs because Defendant is not a person of wealth. This is not a contingency fee case.

I declare under penalty of perjury under the laws of the United States of America and the Commonwealth of the Northern Mariana Islands that the foregoing is true and correct and is based upon my personal knowledge.

Executed in Saipan, CNMI, this November 16, 2005.


ROBERT W. PURSER

RICHARD W. PIERCE

Law Office of Richard W. Pierce
 P. O. Box 503514
 Beach Road, San Jose Village
 Saipan MP, 96950-3514

Statement

Date

11/15/2005

To:

Isoda, Mike

Terms	Due Date	Amount Due
	11/15/2005	\$215.00

Date	Transaction	Amount	Balance	Rate	Quantity	Item
10/31/2004	Balance forward	0.00				
11/17/2004	Meet with client for one hour; agree to take case for \$215.00 per hour; \$3000.00 on retainer.	107.50	107.50	215.00	0.5	Atty Time
11/22/2004	Meet with client and obtain \$3,000.0 in trust and talk about domicile and residency; prepare answer and organize removal	286.67	394.17	215.00	1.33333	Atty Time
11/26/2004	Review answer and prepare notice of removal.	161.25	555.42	215.00	0.75	Atty Time
11/27/2004	Review removal papers and letter to client	64.50	619.92	215.00	0.3	Atty Time
11/29/2004	Filing Fee	150.00	769.92	150.00	1	
12/20/2004	Prepare Initial Disclosure and case management document	107.50	877.42	215.00	0.5	Atty Time
01/12/2005	Case management conference and view site; Judge wants parties to sell	143.33	1,020.75	215.00	0.66667	Atty Time
02/02/2005	Meet with client over selling land.	43.00	1,063.75	215.00	0.2	Atty Time
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due	
215.00	0.00	0.00	0.00	0.00	\$215.00	

Phone #	Fax #	E-mail
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Statement

Date

11/15/2005

To:

Isoda, Mike

Terms	Due Date	Amount Due
	11/15/2005	\$215.00

Date	Transaction	Amount	Balance	Rate	Quantity	Item
05/02/2005	Meet with client and complete interrogatory responses.	347.58	1,411.33	215.00	1.61667	Atty Time
06/16/2005	Conference with Mike to prepare for deposition	232.92	1,644.25	215.00	1.08333	Atty Time
06/17/2005	Research law and facts and message to Cushnie	322.50	1,966.75	215.00	1.5	Atty Time
06/18/2005	Prepare deposition questions	64.50	2,031.25	215.00	0.3	Atty Time
06/20/2005	Deposition of Mr. Guerrero	240.08	2,271.33	215.00	1.11667	Atty Time
06/21/2005	Mike Deposition	250.83	2,522.16	215.00	1.16667	Atty Time
06/28/2005	PMT - From Trust Account	-2,522.16	0.00			
10/11/2005	work on summary judgment memorandum	225.75	225.75	215.00	1.05	Atty Time
10/13/2005	Research and work on memo	1,343.75	1,569.50	215.00	6.25	Atty Time
10/14/2005	Finalize memorandum and other papers to be filed today	559.00	2,128.50	215.00	2.6	Atty Time
10/27/2005	Read opposition brief	43.00	2,171.50	215.00	0.2	Atty Time
11/01/2005	Reply brief	293.83	2,465.33	215.00	1.36667	Atty Time
11/03/2005	Meet with client	129.00	2,594.33	215.00	0.6	Atty Time
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due	
215.00	0.00	0.00	0.00	0.00	\$215.00	

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Statement

Date

11/15/2005

To:

Isoda, Mike

		Terms		Due Date		Amount Due	
				11/15/2005		\$215.00	
Date	Transaction	Amount	Balance	Rate	Quantity	Item	
11/09/2005	Prepare for argument	215.00	2,809.33	215.00	1	Atty Time	
11/10/2005	Court hearing	222.17	3,031.50	215.00	1.03333	Atty Time	
11/11/2005	PMT	-3,031.50	0.00				
11/14/2005	Court hearing	215.00	215.00	215.00	1	Atty Time	
CURRENT		1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due	
215.00		0.00	0.00	0.00	0.00	\$215.00	

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Law Office of Richard W. Pierce

11/15/2005

Register: Client Trust Liability Isoda

From 01/01/2005 through 11/15/2005

Sorted by: Date, Type, Number/Ref

Date	Number	Payee	Account	Memo	Increase	C	Decrease	Balance
03/14/2005			RW Pierce	VOID: Funds ...		X		3,000.00
03/14/2005			RW Pierce	VOID: Funds ...		X		3,000.00
06/28/2005	1039	Marianas Transcripti...	Trusts	Transcript of P...		156.00		2,844.00
06/28/2005	1041	Richard W. Pierce La...	Trusts	Statement 6.28....		2,522.16		321.84
11/10/2005		Office of RW Pierce ...	Trusts		2,988.00			3,309.84
11/11/2005	1126	Richard W. Pierce La...	Trusts	Statement 11.1...		3,031.50		278.34
11/11/2005		Bank of Hawaii	Trusts			10.00		268.34